

State of Colorado
Energy & Carbon Management Commission

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Report taken by:
Abdul Elnajdi

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by ECOM is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27. This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Closure request is not available for an Initial Site Investigation and Remediation Workplan.

OPERATOR INFORMATION

Name of Operator: <u>NOBLE ENERGY INC</u>	Operator No: <u>100322</u>	Phone Numbers Phone: <u>(970) 730-7281</u> Mobile: <u>()</u>
Address: <u>1099 18TH STREET SUITE 1500</u>		
City: <u>DENVER</u>	State: <u>CO</u>	Zip: <u>80202</u>
Contact Person: <u>Dan Peterson</u>	Email: <u>rbueuf27@chevron.com</u>	

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION

Remediation Project #: 20996 Initial Form 27 Document #: 402876944

PURPOSE INFORMATION

- Rule 913.c.(1): Pit or Cuttings Trench closure.
- Rule 913.c.(2): Buried or partially buried vessel closure, which will be by removal.
- Rule 913.c.(3): Remediation of Spill and Releases pursuant to Rule 912.
- Rule 913.c.(4): Land treatment of Oily Waste pursuant to Rule 905.e.
- Rule 913.c.(5): Closure of Centralized E&P Waste Management Facilities pursuant to Rule 907.h.
- Rule 913.c.(6): Remediation of impacted Groundwater pursuant to Rule 915.e.(3).D, and the contaminant concentrations in Table 915-1.
- Rule 913.c.(7): Investigation and remediation of natural gas in soil or Groundwater.
- Rule 913.c.(8): When requested by the Director due to any potential risk to soil, Groundwater, or surface water.
- Rule 913.c.(9): Decommissioning of Oil and Gas Facilities.
- Rule 913.g: Changes of Operator.
- Rule 915.b: Request to leave elevated inorganics in situ.
- Other: _____

SITE INFORMATION

Yes Multiple Facilities

Facility Type: <u>TANK BATTERY</u>	Facility ID: <u>481174</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Caprio A 26-4,5 TB</u>	Latitude: <u>40.458993</u>	Longitude: <u>-104.526457</u>	
** correct Lat/Long if needed: Latitude: <u>40.458993</u>		Longitude: <u>-104.526457</u>	
QtrQtr: <u>SWNW</u>	Sec: <u>26</u>	Twp: <u>6N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>
Facility Type: <u>SPILL OR RELEASE</u>	Facility ID: <u>481904</u>	API #: _____	County Name: <u>WELD</u>
Facility Name: <u>Carpio A26-05 Facility</u>	Latitude: <u>40.458760</u>	Longitude: <u>-104.526499</u>	
** correct Lat/Long if needed: Latitude: _____		Longitude: _____	
QtrQtr: <u>SWNE</u>	Sec: <u>26</u>	Twp: <u>6N</u>	Range: <u>64W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u>

SITE CONDITIONS

General soil type - USCS Classifications SW _____

Most Sensitive Adjacent Land Use Crop Land _____

Is domestic water well within 1/4 mile? Yes _____

Is surface water within 1/4 mile? Yes _____

Is groundwater less than 20 feet below ground surface? No _____

Other Potential Receptors within 1/4 mile

Farm Structures 0.08/0.09/0.12/0.21/0.24mi W, 0.17/0.22mi N, 0.21/0.23mi S
Freshwater Pond 0.04mi W
Freshwater Emergent Wetland 0.06mi NW, 0.07mi W, 0.25mi SW
Riverine 0.19mi W

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|----------------------------------------------------|------------------------------------------------------|----------------------------------------|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input checked="" type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input checked="" type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

Impacted?	Impacted Media	Extent of Impact	How Determined
Yes	GROUNDWATER	NA	Lab analysis if encountered
No	SOILS	NA	Lab analysis if encountered

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

A site investigation was conducted pursuant to COGCC Rule 911 at the CARPIO T6N-R64W-S26 L01 Tank Battery location.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Grab confirmation soil samples were collected from the produced water vessel(s) excavation, beneath the ground oil tank(s), and at the separator(s). Additionally, soil samples were collected at the points of material change and/or hammer unions, directional changes, as well as at the bell holes on either side of a waterway, where applicable. Soil samples were analyzed by a certified laboratory for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per COGCC Table 915-1, and EC, SAR, pH, and boron. All samples collected were analyzed by a certified laboratory using approved COGCC laboratory analysis methods.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Groundwater was encountered during the site investigation a grab groundwater was collected and analyzed for all organic compounds per COGCC Table 915-1.

Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

A Site Assessment was conducted to delineate impacted media at the facility. A total of five soil borings were advanced in the area of impacts. Soil samples were collected and analyzed for TPH (total volatile [C6-C10] and extractable [C10-C36] hydrocarbons), organic compounds in soil per COGCC Table 915-1, metals in soil per COGCC Table 915-1, and pH, EC, SAR, and boron. Each of the five soil borings were converted to temporary groundwater monitoring wells. Five groundwater samples were collected and analyzed for BTEX, naphthalene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and inorganic parameters.

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

NA / ND

Number of soil samples collected 26

ND Highest concentration of TPH (mg/kg) _____

Number of soil samples exceeding 915-1 17

-- Highest concentration of SAR 3.22

Was the areal and vertical extent of soil contamination delineated? Yes

BTEX > 915-1 No

Approximate areal extent (square feet) 100

Vertical Extent > 915-1 (in feet) 0

Groundwater

Number of groundwater samples collected 6

-- Highest concentration of Benzene (µg/l) 100

Was extent of groundwater contaminated delineated? Yes

-- Highest concentration of Toluene (µg/l) 110

Depth to groundwater (below ground surface, in feet) 2

-- Highest concentration of Ethylbenzene (µg/l) 92

Number of groundwater monitoring wells installed 10

-- Highest concentration of Xylene (µg/l) 5600

Number of groundwater samples exceeding 915-1 2

NA Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

Number of surface water samples exceeding 915-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

Concurrently with the site assessment activities, a total of 20 background soil samples were collected from 10 discrete locations (BG01-BG10) and were analyzed for EC and metals in soil per ECMC Table 915-1. The background sampling results were submitted with the Site Assessment Report attached to ECMC Document #403485245.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards)

Volume of liquid waste (barrels)

Is further site investigation required?

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Refer to the remediation summary section below.

REMEDIATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

A site assessment was conducted between June 16, 2022 and September 21, 2022 to delineate impacted media. A total of ten soil borings (BH01-BH10) were advanced to delineate the groundwater impacts identified during facility decommissioning at sample location GW01@3.5'. Soil samples were collected and submitted for full ECMC table 915-1 analyses. Additionally, two soil borings (BH11 and BH12) were advanced to delineate EC impacts identified in soil boring BH10. Concurrently with the site assessment activities, a total of 20 background soil samples were collected from 10 discrete locations (BG01-BG10) and were analyzed for EC and metals in soil per ECMC Table 915-1. The background sampling results were submitted with the Site Assessment Report attached to ECMC Document #403485245.

Based on the full delineation of EC impacts above background levels, a detailed reclamation plan will be generated for the site and submitted on a subsequent form 27. A detailed analysis to eliminate metals as contaminants of concern is presented in the operator comments section of this Form 27.

Soil Remediation Summary

In Situ

Ex Situ

Bioremediation (or enhanced bioremediation)

Excavate and offsite disposal

_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

If Yes: Estimated Volume (Cubic Yards) _____
Name of Licensed Disposal Facility or ECMC Facility ID # _____
_____ Excavate and onsite remediation
_____ Land Treatment
_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Other _____

Groundwater Remediation Summary

_____ Bioremediation (or enhanced bioremediation)
_____ Chemical oxidation
_____ Air sparge / Soil vapor extraction
_____ Natural Attenuation
_____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

Quarterly groundwater monitoring was discontinued per the approval of ECMC Document #403485245.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Approved Reporting Schedule:

Quarterly Semi-Annually Annually Other

Request Alternative Reporting Schedule:

Semi-Annually Annually Other

Rule 913.e:

After initial approval of a Form 27, the Operator will provide quarterly update reports in a Supplemental Form 27 to document progress of site investigation and remediation, unless an alternative reporting schedule has been requested by the Operator and approved by the Director. The Director may request a more frequent reporting schedule based on site-specific conditions.

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report

Other Background sampling analysis

Adequacy of Operator's General Liability Insurance and Financial Assurance

Describe the adequacy of the Operator's general liability insurance and Financial Assurance to fully address the anticipated costs of Remediation, including the estimated remaining cost for this project (below).

If this information has been provided on a Form 27 within the last 12 months, provide the Document Number of that form.

Noble intends to directly address the costs of remediation at the locations as part of our asset retirement obligation process and operations. Noble has general liability insurance (policy MWZZ 316714) and financial assurance in compliance with COGCC rules. Records are available on the COGCC's website. The cost for remediation is an estimate only, costs may change upwards or downward based on site-specific information. Noble makes no representation or guarantees as to the accuracy of the estimate.

Operator anticipates the remaining cost for this project to be: \$ 50000

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? No

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

Volume of E&P Waste (solid) in cubic yards _____

E&P waste (solid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

Volume of E&P Waste (liquid) in barrels _____

E&P waste (liquid) description _____

ECMC Disposal Facility ID #, if applicable: _____

Non-ECMC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? No

If YES:

Compliant with Rule 913.h.(1).

Compliant with Rule 913.h.(2).

Compliant with Rule 913.h.(3).

Do all soils meet Table 915-1 standards? _____

Does the previous reply indicate consideration of background concentrations? _____

Does Groundwater meet Table 915-1 standards? _____

Is additional groundwater monitoring to be conducted? _____

Operator shall comply with the ECMC 1000-Series Reclamation Requirements for all impacted and disturbed areas.

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeded program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will be in accordance with COGCC 1000 Series Rules. A detailed reclamation plan will be generated to address EC exceedances observed at sample locations BH07@4' and BH10@4'.

Is the described reclamation complete? No _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim

Final

Did the Surface Owner provide the seed mix? _____

If YES, does the seed mix comply with local soil conservation district recommendations? _____

Did the local soil conservation district provide the seed mix? _____

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation. 03/11/2022

Proposed date of completion of Reclamation. 12/05/2025

IMPLEMENTATION SCHEDULE

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

PRIOR DATES

Date of Surface Owner notification/consultation, if required. 09/28/2021

Actual Spill or Release date, or date of discovery. 03/11/2022

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 03/11/2022

Proposed site investigation commencement. 03/11/2022

Proposed completion of site investigation. 06/04/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation. 06/04/2024

Proposed date of completion of Remediation. 12/04/2024

Per Rule 913.d.(2): Any change from the approved implementation schedule will be requested at least 14 days in advance, and the Operator may not make the change without the Director's approval.

Change from approved implementation schedule per Rule 913.d.(2).

Basis for change in implementation schedule:

The Proposed date of completion of Remediation has been updated to reflect the completion of a reclamation plan.

OPERATOR COMMENT

This Form 27 is being submitted to include a detailed analysis of background soil sampling results for the Carpio A26-05 Tank Battery. A complete supplemental site investigation report was previously submitted under ECMC Document #403485245, which is included under Related Forms.

Since background samples were collected from the same depth intervals as soil boring samples and all samples were collected from within a fine-coarse grained sand with lean clay, a comparison of background and soil boring analytical data from all depth intervals is appropriate. Additionally, since soil borings BH05 and BH09 were collected from native soil that has not been influence by oil and gas activity (i.e., no elevated PID readings, inorganic impacts, or organic impacts to soil), and are historically up- or cross-gradient from the release area as demonstrated in the attached potentiometric surface maps, the soil samples from these two borings have been factored into the background analysis discussed below.

The maximum background concentrations (including those observed in BH05 and BH09) for arsenic, barium, lead, and selenium with a 1.25x multiplier applied were calculated to be 14.3 mg/kg, 399 mg/kg, 21.9 mg/kg, and 2.00 mg/kg, respectively. Since the maximum background concentrations for arsenic, barium, lead, and selenium were calculated to be greater than all soil boring concentrations, these metals should not be considered contaminants of concern.

Since the EC exceedances observed at BH07@4' and BH10@4' are fully delineated, a detailed reclamation plan will be generated for the site prior to requesting No Further Action (NFA). The detailed reclamation plan will be submitted on a subsequent Form 27.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Allan Engelhardt

Title: Environmental Consultant

Submit Date: 03/27/2024

Email: chevroneform@tasman-geo.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with ECMC Rules and applicable orders and is hereby approved.

ECMC Approved: Abdul Elnajdi

Date: 10/17/2024

Remediation Project Number: 20996

COA Type

Description

	Operator will continue quarterly reporting until the site investigation is complete and Table 915-1 standards are met within the remediation area.
	Soil borings BH05 and BH09 are located within areas influenced by oil and gas activity, according to the COGCC GIS. Therefore, these sites cannot be used as reliable background references. It's essential to seek alternative locations that represent unaltered native soil for accurate results.
2 COAs	

ATTACHMENT LIST

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

<u>Att Doc Num</u>	<u>Name</u>
403733820	FORM 27-SUPPLEMENTAL-SUBMITTED
403813717	SITE INVESTIGATION REPORT

Total Attach: 2 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
		Stamp Upon Approval

Total: 0 comment(s)